

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Itasca Images, LLC, et al.,

Plaintiffs,

v.

Shutterstock, Inc., et al.

Defendants.

Case No. 21-cv-287 (JRT/DTS)

**JOINT MOTION FOR STAY OF
PROCEEDINGS**

Plaintiffs Itasca Images, LLC and Tony Webster (“Plaintiffs”), through their counsel of record, and defendants Shutterstock, Inc., Archetype Innovations, LLC, and Crazy House Media, LLC (“Defendants”) jointly move to stay all proceedings in the above-captioned case for a period of thirty (30) days. The grounds for this request are that Plaintiffs and Defendants have reached a resolution of the case in principle, and the current schedule contains near-term deadlines for Plaintiffs and Defendants. The parties respectfully submit that the stay is warranted to allow the parties to focus on the preparation of formal papers to memorialize the terms of their resolution.

Dated: June 28, 2022

TAFT STETTINIUS & HOLLISTER LLP

By: /s/Scott M. Flaherty
Scott M. Flaherty (#388354)
Jordan L. Weber (#396769)
O. Joseph Balthazor Jr. (#0399093)
2200 IDS Center
80 South Eighth Street
Minneapolis, MN 55402-2157
Telephone: (612) 977-8400
Fax: (612) 977-8640
Emails: sflaherty@taftlaw.com
jweber@taftlaw.com
obalthazor@taftlaw.com

**ATTORNEYS FOR PLAINTIFFS
ITASCA IMAGES, LLC
AND TONY WEBSTER**

Dated: June 28, 2022

MITCHELL SILBERBERG & KNUPP LLP

By: /s/Eleanor M. Lackman (with consent)
Eleanor M. Lackman (*pro hac vice*)
J. Matthew Williams (*pro hac vice*)
Rebecca Benyamin (*pro hac vice*)
Genevieve Javidzad (*pro hac vice*)
437 Madison Ave., 25th Floor
New York, NY 10022-7001
Telephone: (212) 509-3900
Fax: (212) 509-7239
Emails: eml@msk.com
mxw@msk.com
glj@msk.com

LATHROP GPM LLP

Dean Eyler (#267491)
500 IDS Center
80 South Eighth Street
Minneapolis, MN 55402
Telephone: (612) 632-3016
Fax: (612) 632-4000
Email: dean.eyler@lathropgpm.com

**ATTORNEYS FOR DEFENDANT
SHUTTERSTOCK, INC.**